

**Marie-Ann Greenberg, MAG-1284**

**Marie-Ann Greenberg, Standing Trustee**

**30 TWO BRIDGES ROAD**

**SUITE 330**

**FAIRFIELD, NJ 07004-1550**

**973-227-2840**

**Chapter 13 Standing Trustee**

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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

IN RE:

CANDICE BROOKS

MARK BROOKS

**Case No.: 18-24653SLM**

**HEARING DATE: 09/26/2018**

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**TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN**

Marie-Ann Greenberg, the Chapter 13 Standing Trustee by way of objection to the Debtor's proposed plan respectfully objects as follows:

- The Debtor has failed to provide or has provided a deficient valuation of the Debtor's property to the Standing Trustee, and is not cooperating with the Trustee in violation of 11 U.S.C. Section 521(a)(3).
- Debtor has failed to provide proof of income.

The debtor has failed to provide proof of current income. A paystub from debtor's employer dated no later than two weeks prior to the 341 date must be submitted.

The debtor has failed to provide proof of income for the six months preceding the filing of this case.

- Co-debtor / non filing spouse has failed to provide proof of income.

Specifically,

Failed to provide proof of current income. A paystub from employer dated no later than two weeks prior to the 341 date must be submitted.

Failed to provide proof of income for the six months preceding the filing of this case.

- The Trustee did not receive the required documentation in advance of the 341 meeting. Therefore, a meaningful 341 could not be conducted. The case will be presented for dismissal at confirmation.

WHEREFORE, Marie-Ann Greenberg, the Chapter 13 Standing Trustee prays that confirmation of the Debtor's Chapter 13 plan in its present form be denied.

Dated: August 16, 2018

By: /S/Marie-Ann Greenberg  
Marie-Ann Greenberg, Esquire  
Chapter 13 Standing Trustee